

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 03-12499 MLW

TERRI L. PECHNER-JAMES)
and SONIA FERNANDEZ)
Plaintiffs)
)
VS.)
)
CITY OF REVERE, THOMAS)
AMBROSINO, MAYOR, CITY)
OF REVERE POLICE DEPT.)
TERRENCE REARDON, CHIEF)
OF POLICE, BERNARD FOSTER))
SALVATORE SANTORO, ROY)
COLANNINO, FREDERICK)
ROLAND, THOMAS DOHERTY)
JOHN NELSON, JAMES RUSSO)
MICHAEL MURPHY and)
STEVEN FORD)
Defendants)

EXHIBIT A: SUMMARIZED TIMELINE OF DISCRIMINATORY EVENTS

1. Throughout Plaintiff Fernandez's time with the Revere Police Department, both superior officers and fellow officers would regularly refer to Hispanic persons as "Spics" and African-American persons as "Niggers."
2. On or about September 12, 2002, Plaintiff Fernandez is forced to permanently leave her workplace as a result of the racial and sexually hostile environment in which she had been forced to work.
3. On or about December 7, 2001, Officer Crevoiserat berated Plaintiff Fernandez over dispatch. The incident is heard by several Revere business owners who make comments to her about the incident when she encounters them after the incident.

4. On or about September 30, 2001, Plaintiff Fernandez returns from her unpaid leave to work at the Revere Police Department. She is effectively demoted upon her return.
5. On March 15, 2001, Plaintiff Fernandez begins unpaid leave as a result of the emotional distress caused by the racially and sexually hostile environment in which she is forced to work.
6. On or about March 16, 2001, Lieutenant Foster yells at Plaintiff Fernandez, "Why don't you put the phone in your good ear?" in front of several other male police officers during her shift at the Revere Police Station.
7. On or about February 26, 2001, Plaintiff Fernandez notices women's underwear hanging in the roll call room of the Revere Police Station. It remains there for several days. There is no investigation into the incident and no officer is ever disciplined.
8. On or about, January 23, 2001, Lieutenant Foster accuses Plaintiff Fernandez of not paying attention to him during her shift at the Revere Police Station and screams at her, "Why don't you turn up those hearing aids?"
9. On or about October 12, 2000, Plaintiff Fernandez filed a formal complaint of harassment with the Revere Police Department against Lieutenant Ford. There was no investigation of the complaint and Lieutenant Ford was never disciplined for his conduct.
10. On or about August 13, 2000, Lieutenant Ford took a knife and made a stabbing motion to Plaintiff Fernandez.
11. On or about August 7, 2000, Lieutenant Ford states in the presence of another male officer, "The next female that complains will be downstairs working as a matron.

12. On or about July 1, 2000, Officer in charge at the Revere Police Station calls the largely Hispanic population of Chelsea, Massachusetts “sewage people” in front of several officers during a roll call meeting.
13. Beginning or about February 29, 2000 through May, 2000, Plaintiff Fernandez is not scheduled to work the radio which had been a regular part of her job duties.
14. On or about April 4, 2000, Lieutenant Foster removes Plaintiff Fernandez from dispatch without cause and makes hand gestures imitating sign language to mock her hearing disability.
15. On or about February 28, 2000, Lieutenant Foster screams at Plaintiff Fernandez to “pick up her hair”, asks her if she thinks she’s special and tells her she should “get it off her shoulders or get it cut” in front of other male officers.
16. In 1999, a cruiser that has been assigned to female officers is vandalized in a parking lot. There is no investigation into the incident and the culprit is never caught.
17. In 1999, the Revere Police Department has no policy on sexual harassment and no maternity leave policy for female officers.
18. In late 1998/early 1999, Sergeant Doherty chastises a female officer, stating “Young lady, you will not use that kind of language in front of me. If you do, I will send you home. My wife and daughter never use that kind of language and neither will you.”
19. In late 1998/early 1999, Lieutenant Santoro makes almost daily remarks about his penis and disparaging remarks about the bodies of female officers.
20. In late 1998/early 1999, Chief Russo sees four female officers outside the Revere Police States talking, and states, “What is this a WIC meeting?” [Note: WIC is a welfare program that provides services for low-income women and their babies]

21. In 1998/1999, a booking photo of an African-American man is altered by someone within the Revere Police Department to become a racially offensive caricature in a grass-skirt and carrying a spear. There is no investigation into the incident and no one is ever disciplined.
22. On or about November 1998, Lieutenant Ford berates Plaintiff Fernandez in front of Officer Burke, "What are you? Spanish, Mexican, Cuban, you're all alike, a bunch of cockroaches."
23. In 1998, an unknown officer drew a dildo and ejaculate on the chalkboard facing the radio communications room in the Revere Police Station. It remains there for several days. There is no investigation into the incident and no officer is ever disciplined.
24. On or about January 25, 1998, Sergeant Doherty states of a female sports announcer, "She was no fucking good", that "women should not be allowed to comment on sports events", that "this bitch probably gave sex or a blow job to someone for the job", and that "she was probably related to someone and that's how she got the job."
25. In December, 1997, Plaintiff Fernandez is placed on walking routes more frequently than other male officers. Captain Chaulk monitors her from a police cruiser. Sometime later that winter, Captain Chaulk orders her out of a police cruiser during a shift to a walking route without explanation as a punishment.
26. On or about April 18, 1997, Sergeant Doherty berates Officer Lyn Curcio and other female officers within hearing distance of Revere citizens involved after receiving a complaint that Officer Curcio used profanity.
27. On or about February 23, 1997, Chief Russo states "These are not the good old days when we didn't have to hire females."

28. Throughout 1996/1997, there is no bathroom or separate changing room for female officers in the Revere Police Station.

29. Throughout 1996/1997, Lieutenant Ford routinely makes personal comments about Plaintiff Fernandez's appearance, hair, and weight.

30. On or about May 1996, Captain Roland called Plaintiff Fernandez while she was off duty at home. He asked her to go to a location to translate and she agreed. He did not inform it was a homicide crime scene and specifically told her that she did not need to wear her uniform or carry her firearm. When she arrived at the scene in her street clothes, she was asked by male officer if she was "working undercover as a hooker."

31. In 1995, Chief Russo called Plaintiff Fernandez into his officer and confronted her with allegations that she was suicidal, on drugs, and that her family was "known to the police."